

Date: February 22, 2012

To: Alex Westhoff, Environmental Planner, Delta Protection Commission

From: Heather Scotten, Assistance Coordinator for Heritage Areas, National Park Service
Linda Stonier, Regional Coordinator, Pacific West Region National Heritage Area Program, National Park Service

Subject: Draft Feasibility Study for a Sacramento-San Joaquin Delta National Heritage Area (January 2012)

We have reviewed the above study for its consistency with our interim *National Heritage Area Feasibility Study Guidelines*. While it is not appropriate for NPS to make a recommendation regarding National Heritage Area designation unless asked to provide testimony on a pending bill before Congress, we may provide feedback about studies in progress upon request.

We wish to congratulate you on your progress to date, and to acknowledge the hard work that went into the preparation of this study. In its current form, however, we find it does not support all ten evaluation criteria outlined in the guidelines. We offer the following observations and suggestions to assist you in further developing your study to fully address the guidelines.

National Importance (criterion 1). The study should identify the one story that makes the landscape nationally important. This is the story that cannot be told anywhere else in the nation, and which the area's resources and themes support to justify designation of the landscape as a National Heritage Area. Consider these examples:

- The Gullah Geechee National Heritage Area is nationally important because of its association with enslaved Africans that were brought to the coastal southeastern United States from West and Central Africa. The unique culture continues today by their descendants, known as the Gullah/Geechee people. Themes associated with their nationally important story include the quest for freedom and equality, African connections, Creole language, and spiritual expression of culture. Their resources include nationally significant national register sites and national historic landmarks - Gullah/Geechee villages, churches, and other sites that are important to Gullah/Geechee cultural traditions - wetlands and riverine systems which shaped the Gullah/Geechee culture.
- The John H. Chafee Blackstone River Valley National Heritage Corridor is a nationally important landscape because it was the birthplace of the American Industrial Revolution. This area and the remaining cultural resources tell the story of how factories changed the face of American industry and culture. Themes associated with the nationally important story include farms to factories, mill towns and infrastructure, and canalway transportation.

Resource Inventory (criteria 1, 2 and 5). The study should contain a comprehensive inventory of heritage resources that specifically relates to the nationally important story and study themes. For example, what is the connection between the National Register properties list that includes the County Hall of Records and the Martinez City Library and the proposed heritage area's themes? Conversely, we do not find documentation of other major resources which would seem related to the proposed themes, such as water system features in the landscape including dykes and levees.

Boundary Description (criterion 9). The study should provide a clear explanation of a proposed heritage area boundary, which should be defined to encompass the resources that tell the nationally important story. The legal boundary of the Delta, for example, does not in and of itself appear to reflect a nationally important cultural landscape. The study's proposed alternative boundary which includes Suisun Marsh and the Carquinez Strait is not supported by either the inventory of heritage resources or the proposed themes. The study should provide a description of the landscape boundary based upon the natural, cultural, historic, and scenic resources that relate to your nationally important story.

Opportunities (criteria 3 and 4). The study should discuss the specific regional opportunities for heritage development, i.e., the "what and where" potential for conservation, recreation, and education projects and programs to meet the proposed heritage area goals. This aspect of the study is key to understanding the feasibility for the proposed heritage area coordinating entity and its partners to conserve, enhance, enjoy and share the benefits of the region's heritage assets.

Financial Plan (criterion 6). The study should include a three-year financial plan for the proposed coordinating entity that outlines basic operating costs including staff, rent, communications, etc., as well some early project costs and anticipated revenue streams. The financial plan should also take into account the potential costs of a management plan that is generally required to be completed within three years of designation.

Management Entity (criterion 10). The study would benefit from more organizational information about the Delta Protection Commission. Does the commission have staff and office space? Will the staff be responsible for coordinating heritage area activities? How will the proposed affiliated nonprofit organization be selected or created? How will the Commission interact with this organization?

In addition, we offer the following comments for your consideration as you revise the draft feasibility study:

- A landscape history of the proposed heritage area would provide valuable context for the study themes and resource inventory. A history of the Delta - how it came to look the way it does through human interaction with the landscape - would be an important foundation for this study.
- Page 2: "This feasibility study serves as the application..." The feasibility study is not an application, rather an assessment of whether (1) the landscape has an assemblage of

natural, cultural, historic, and scenic resources that, when linked together, tell a nationally important story; (2) an organization exists that has the financial and organizational capacity to coordinate heritage area activities; and (3) support for NHA designation exists within the region.

- Chapter 5: An introduction to this chapter would help us understand its purpose. You may also wish to add commentary that relates the information provided to the story, themes and opportunities of the proposed heritage area.
- The study provides excellent background on the public outreach conducted during its preparation. Documentation that public support for heritage area designation exists within the larger alternative boundary area that includes the Suisun Marsh and Carquinez Strait would further strengthen this element.

We hope these observations and comments are helpful. Please do not hesitate to contact us if you would like additional clarification or guidance as you further develop and complete your study. And again, we would again like to complement you on your good work to date.